

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

CHARLOTTE DEAN,

Plaintiff,

v.

NOVARTIS PHARMACEUTICALS
CORPORATION,

Defendant.

No. 2:20-cv-02755-JMV-MF

NOTICE OF MOTION FOR
PRO HAC VICE ADMISSION OF RAYMOND C. SILVERMAN

PLEASE TAKE NOTICE that on July 6, 2020 or as soon thereafter as counsel can be heard, Plaintiff Charlotte Dean, by and through counsel, will move pursuant to Local Civil Rule 101.1 in the United States District Court for the District of New Jersey, before the Hon. John Michael Vazquez, United States District Judge, at the United States District Courthouse, Martin Luther King Federal Building & U.S. Courthouse, 50 Walnut St., Newark, NJ 07101, for the issuance of an Order permitting Raymond C. Silverman to appear on behalf of the Plaintiff in this action *pro hac vice*.

PLEASE TAKE NOTICE that Plaintiff will rely on the accompanying Declarations of Melanie H. Muhlstock, Esq. and Raymond C. Silverman, Esq. in support of the instant motion, submitted herewith, along with a proposed form of Order.

Dated: June 1, 2020

Respectfully Submitted,

PARKER WAICHMAN LLP

/s/Melanie H. Muhlstock

Melanie H. Muhlstock
PARKER WAICHMAN LLP

6 Harbor Park Drive
Port Washington, NY 11050
(516) 466-6500
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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I certify that on this June 1, 2020, I electronically filed the foregoing document with the Clerk of the Court and a copy of the foregoing was served upon all counsel of record by using the CM/ECF system.

/s/Melanie H. Muhlstock
Melanie H. Muhlstock

Attorney for Plaintiff

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

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**DECLARATION OF MELANIE H. MUHLSTOCK IN SUPPORT OF PLAINTIFF'S
MOTION FOR ADMISSION OF RAYMOND C. SILVERMAN *PRO HAC VICE***

Melanie H. Muhlstock, being of full age, hereby declares as follows:

1. I am a partner at the law firm of Parker Waichman LLP and an attorney of record for Plaintiff in the above-captioned matter. The following declaration is based on my personal knowledge and review of my files. I submit this declaration in support of Plaintiff's Motion for Admission of Raymond C. Silverman *pro hac vice*.
2. I am a member in good standing of the bar of the State of New Jersey, as well as the bar of this Court, the United States District Court for the District of New Jersey.
3. Plaintiff has requested that Raymond C. Silverman, a partner at Parker Waichman LLP, participate as counsel in this matter on her behalf.
4. Submitted with this application is the Certification of Raymond C. Silverman, demonstrating his full compliance with the requirements for admission *pro hac vice* to this Court.
5. I have read the Certification of Raymond C. Silverman, demonstrating his full compliance with the requirements for *pro hac vice* admission to this Court.

6. If the Court grants this application for *pro hac vice* admission, either the undersigned or another attorney associated with Parker Waichman LLP licensed to practice in New Jersey and before this Court will continue to serve as counsel of record in this matter, will review and sign all pleadings, briefs, and other papers filed with the Court, will be responsible for the conduct of this action and for the conduct of the attorney admitted *pro hac vice*, and will otherwise comply with all of the terms and conditions of L. Civ. R. 101.1(c).

7. Pursuant to the Rules of this Court, it is respectfully requested that the Court grant this application for Raymond C. Silverman to be admitted *pro hac vice* to serve as counsel on behalf of Plaintiff Charlotte Dean.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: June 1, 2020

/s/ *Melanie H. Muhlstock*
Melanie H. Muhlstock

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

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No. 2:20-cv-02755-JMV-MF

DECLARATION OF RAYMOND C. SILVERMAN
IN SUPPORT OF MOTION FOR ADMISSION *PRO HAC VICE*

Raymond C. Silverman, being of full age, hereby declares as follows:

1. I am a partner in the law firm of Parker Waichman LLP, 6 Harbor Park Drive, Port Washington, New York 11050, Telephone: (516) 466-6500, Facsimile: (516) 466-6665, Email: rsilverman@yourlawyer.com.
2. I make this Declaration in support of the instant Motion of Melanie H. Muhlstock seeking my admission to the bar of this Court *pro hac vice* to represent Plaintiff Charlotte Dean. I am personally familiar with the facts hereinafter set forth.
3. I am duly-authorized to practice law and am a member in good standing of the bar of the State of New York (Bar No. 3033743, Admitted: 2000), as well as the U.S. District Court for the Southern District of New York (2005); United States District Court for the Eastern District of New York (2005); United States District Court for the Northern District of New York (2005); and United States District Court for the Western District of New York (2007).

4. There are presently no disciplinary proceedings pending against me in any of the above listed courts. I am not under suspension or disbarment in any Court.

5. I have not been denied admission to, been disciplined by, resigned from, surrendered my license to practice before, or withdrawn an application for admission to practice while facing a disciplinary complaint before this Court or any other Court.

6. Plaintiff has requested that I represent her, and *pro hac vice* admission will allow me to participate as counsel in this matter on her behalf.

7. Melanie H. Muhlstock is authorized to practice in New Jersey and is a member in good standing of the bar of this Court.

8. I will comply with the requirements of the rules of this Court, including the requirements of L. Civ. R. 101.1(c)(3), which requires payment be made to the New Jersey Lawyers' Fund for Client Protection; L. Civ. R. 101.1(c)(4), which provides that only an attorney of the bar of this Court may file papers, enter appearances for parties, sign stipulations, or sign and receive payments on judgements, decrees on orders; L. Civ. R. 103.1, the provision regarding Judicial Ethics and Professional Responsibility; and L. Civ. R. 104.1, the provision regarding Discipline of Attorneys.

9. I understand that, upon my admission *pro hac vice*, I will be within the disciplinary jurisdiction of this Court. I consent to the appointment of the Clerk of the Court as the agent upon whom service of process may be made for all actions against counsel that arise from my participation in this matter.

10. I agree to notify the Court immediately of any matter affecting my standing at the bar of any other Court

11. For the foregoing reasons, it is respectfully requested that the Court grant my application to appear *pro hac vice* in this matter.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: June 1, 2020

/s/ Raymond C. Silverman
Raymond C. Silverman

UNITED STATES DISTRICT COURT
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ORDER FOR ADMISSION OF RAYMOND C. SILVERMAN *PRO HAC VICE*

THIS MATTER having come before the Court on the application of Plaintiff Charlotte Dean, by and through her attorney Melanie H. Muhlstock at Parker Waichman LLP, for the *pro hac vice* admission of Raymond C. Silverman (“Counsel”) pursuant to Local Civil Rule 101.1(c), with consent of defendants’ counsel; and the Court having considered the declarations in support of the application, which reflect that Counsel satisfies the requirements set forth in Local Civil Rule 101.1(c)(1) of the United States District Court for the District of New Jersey;

IT IS ON THIS _____ day of _____ 2020,

ORDERED that the application for the *pro hac vice* admission of Counsel is granted;

IT IS FURTHER ORDERED that Counsel shall abide by all rules of this Court, including all disciplinary rules, and shall notify the Court immediately of any matter affecting Counsel’s standing at the bar of any court;

IT IS FURTHER ORDERED that Counsel is deemed to consent to the appointment of the Clerk of the Court as the agent upon whom service of process may be made for all actions against Counsel that may arise from Counsel’s participation in this matter;

IT IS FURTHER ORDERED that Melanie H. Muhlstock at Parker Waichman LLP, shall

(a) be attorney of record in this case in accordance with L. Civ. R. 101.1(c); (b) be served all papers in this action and such service shall be deemed sufficient upon Counsel; (c) sign (or arrange for a member of the firm admitted to practice in New Jersey to sign) all pleadings, brief, and other papers submitted to this court; and (d) be responsible for the conduct of the case and Counsel in this matter; and

IT IS FURTHER ORDERED that Counsel, individually, shall make payments to the New Jersey Lawyer's Fund for Client Protection, pursuant to N.J. Court Rule 1:28-2(s) and pursuant to Local Rule 101.1(c)(2), for each year in which Counsel represents the client in this matter, and that Counsel shall pay the sum of \$150.00 to the Clerk of the United States District Court in accordance with Local Civil Rule 101.1(c)(3).

UNITED STATES DISTRICT JUDGE